

STEPHANIE WADSWORTH)
Individually and as Parent and Legal Guardian)
of W.W., K.W., G.W., and L.W., minor children)
and MATTHEW WADSWORTH,)
)
Plaintiffs,)
)
v.)
)
WALMART INC. and)
JETSON ELECTRIC BIKES, LLC,)
)
Defendants.)

Case No. 2:23-cv-00118-NDF

DEFENDANTS JETSON
ELECTRIC BIKES, LLC AND
WALMART INC.'S **MOTION TO
EXCLUDE TESTIMONY OF
DEREK KING;**
MEMORANDUM IN SUPPORT
OF MOTION

WALMART INC. (“Walmart”) and JETSON ELECTRIC BIKES, LLC (“Jetson”), (collectively “Defendants”), by and through their attorneys, Crowley Fleck PLLP and McCoy Leavitt Laskey LLC, hereby submit their Motion to Exclude Testimony of Derek King (the “Motion”).

This Motion is brought pursuant to Federal Rules of Evidence 702, the Court’s inherent powers, and is based upon the exhibits, declarations, Memorandum in Support of Motion, the pleadings on file in this matter and on any further evidence or matters that may be presented to the Court.

Pursuant to Local Rule 7.1(b)(1) Defendants further certify that they met and conferred with Plaintiffs’ counsel on this instant Rule 702 *Daubert* motion on November 22, 2024 via Zoom conference and Plaintiffs indicated that they would not agree to the motion.

McCOY LEAVITT LASKEY LLC

Attorneys for Defendants, Jetson Electric Bikes,
LLC and Walmart Inc.

Dated: December 2, 2024

By: _____



Eugene M. LaFlamme (*pro hac vice*)
Jared B. Giroux (*pro hac vice*)
Jillian L. Lukens (*pro hac vice*)
McCoy Leavitt Laskey, LLC
N19 W24200 Riverwood Drive, Suite 125
Waukesha, WI 53188
(P) 262-522-7000
elaflamme@MLLlaw.com
jgiroux@MLLlaw.com
jlukens@MLLlaw.com

and

Timothy M. Stubson, Wyo. Bar No. 6-3144
Brandon E. Pryde, Wyo. Bar No. 8-6883
Holly L. Tysse, Wyo. Bar No. 7-5553
Crowley Fleck, PLLP

111 West 2nd Street, Suite 220
Casper, WY 82601
(P) 307-232-6901
tstubson@crowleyfleck.com
bpryde@crowleyfleck.com
htysse@crowleyfleck.com